FEDERAL PUBLIC DEFENDER

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July 8, 2025

The Honorable Donna M. Ryu United States Magistrate Judge 1301 Clay Street Oakland, CA 94612 Attn: Courtroom Deputy Ivy Garcia

US v. Kory Kingsley, 4:24-cr-00366-YGR (DMR) Request to calendar matter for Thursday, July 17, 2025, for request to modify bail conditions

Your Honor:

I am writing to ask that the above-referenced matter be added to the Court's calendar for Thursday, July 17, at 10:30 a.m. so that the defense can address the court regarding a request to modify bail conditions. The defense is requesting that bail conditions be modified in two ways: 1) to allow Mr. Kingsley to travel to the Eastern District of California where his children now reside with their mother; and 2) to allow Mr. Kingsley to live with his father in Martinez, California. Pretrial has no objection to these modifications. The government objects to these proposed modifications and, as to travel to the Eastern District, requests a visitation schedule rather than a blanket approval of travel to that district. Mr. Kingsley has been on pretrial release since September 6, 2024, without a Form 8 Pretrial Violation. He graduated from New Bridge and has been living in New Bridge's SLE housing.

Defense counsel has conferred with the government and pretrial and they are available on July 17.

Thank you.

Sincerely,

JODI LINKER Federal Public Defender Northern District of California

/S/

ELISSE LAROUCHE Assistant Federal Public Defender

cc: Maya Karwande, AUSA and Sarai Canales, US Pretrial